

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY
LITIGATION

Master File No. 2:12-MD-02327
MDL 2327

ETHICON WAVE 12 CASES LISTED IN
EXHIBIT A

JOSEPH R. GOODWIN
U.S. DISTRICT JUDGE

**NOTICE OF ADOPTION OF PRIOR DAUBERT MOTION OF
JOHN R. WAGNER, M.D. FOR WAVE 12**

Comes now, the Plaintiffs, and hereby adopt and incorporate by reference the Daubert motion, memorandum and reply brief filed in relation to John R. Wagner for Ethicon Wave 4, Dkt. 3617 (motion), Dkt. 3618 (memorandum in support) and Dkt. 3851 (reply brief) and Wave 6, Dkt. 4876 (motion), Dkt. 4879 (memorandum in support) and Dkt. 5044 (reply brief).

Plaintiffs respectfully request that the Court exclude John R. Wagner's testimony, for the reasons expressed in the Waves 4 and 6 briefing. This notice applies to the following Wave 12 cases identified in Exhibit A attached hereto.

Dated: October 29, 2019

Respectfully submitted,

/s/ D. Renee Baggett

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EXHIBIT A

Boland, Anneliese	2:13-cv-32278
Burris, Tina	2:14-cv-24320
Cayer, Diane	2:12-cv-09976
Hicks, Susan	2:17-cv-01971
Hunt, Barbara	2:17-cv-02945
Miller, Madelien	2:14-cv-27841
Pitlyk, Denise	2:14-cv-31208
Rusciano, Susan	2:13-cv-13073
Schmalz, Tammy Lyne	2:16-cv-11039

CERTIFICATE OF SERVICE

I hereby certify that on October 29, 2019, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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